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Class Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST
LITIGATION

Master File No. 3:17-md-02801-JD
Case No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO:
THE DIRECT PURCHASER CLASS ACTIONS

**DIRECT PURCHASER CLASS'S
SUPPLEMENTAL REQUEST FOR
JUDICIAL NOTICE OF ASSOCIATED
AMENDED JUDGMENTS OF
NICHICON CORPORATION AND
HITACHI CORPORATION**

Date: February 13, 2020
Time: 1:30 PM
Judge: Honorable James Donato
Courtroom: 11, 19th Floor

SUPPLEMENTAL REQUEST FOR JUDICIAL NOTICE

Direct Purchaser Plaintiffs (the “Class”) respectfully request that the Court take judicial notice, pursuant to Federal Rule of Evidence (“Rule”) 201(b), of the following supplemental documents attached as exhibits U and V (collectively the “associated amended judgments”) to the Supplemental Declaration of Steven N. Williams in Support of Direct Purchaser Plaintiffs’ Request for Judicial Notice (“Williams Supplemental Decl.”).¹ The sole purpose of this supplement request is to add two amended judgments that were entered in the criminal matters described below to those matters for which judicial notice is sought, each of which changed the end date for conspiratorial conduct in violation of Section 1 of the Sherman Act

| Exhibit and Declaration Reference | Description |
|-----------------------------------|--|
| ¶ 22, Exh. U | Amended Judgment in a Criminal Case in <i>U.S. v. Nichicon Corporation</i> , No. 4:17-cr-00368-JD (CAND), Dkt. No. 48, filed on November 08, 2019. |
| ¶ 23, Exh. V | Amended Judgment in a Criminal Case in <i>U.S. v. Hitachi Corporation.</i> , No. 4:16-cr-00180-JD (CAND), Dkt. No. 32, filed on July 13, 2016. |
| | |

ARGUMENT

The guilty pleas and judgments entered in the related criminal cases are admissible and subject to judicial notice for all of the reasons set forth in the Direct Purchaser Class’s Request for Judicial Notice of Plea Agreements and Associated Judgments (“RJN”), ECF No. 2547.

CONCLUSION

For the reasons set forth in the RJN and in this Supplemental Request for Judicial Notice, the Class respectfully requests that the Court take judicial notice of each of the Exhibits U and V, and the facts stated therein.

¹ All references herein preceded by “Exh.” or “Exhs.” are to exhibits to Williams Supplemental Decl.

1 Dated: February 12, 2020

Respectfully Submitted,

2 JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/ Joseph R. Saveri

4 Joseph R. Saveri

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